

## **United States Bankruptcy Court District of Oregon**

**RE: In re: [Debtor's Name], Case No. 23-62260-dwh11, Claim No. 501**

**Subject: Motion to Reinstate Claim No. 501 and Response to Amended Objection**

**To the Honorable Judge David W. Hercher, Attorney for Debtor: Tim Conway**

I am writing to address the amended objection to my Claim No. 501, filed on January 17, 2025 (Doc. 759), and to respectfully request that my claim be reinstated despite my missing the 30-day response deadline.

I sincerely apologize for my failure to respond within the prescribed timeframe. I believe this oversight occurred due to one or more of the following circumstances:

- 1. Possible Mail Delivery Issues:** It is possible that the notice was misdelivered by the postal service or inadvertently discarded with advertising mail.
- 2. Inadvertent Oversight:** Due to the volume of mail I receive, it is possible I overlooked the notice, especially if it was mixed with advertising or other less important documents.
- 3. Lack of Proper Notice:** To my knowledge, I did not receive proper notice of the "amended objection".

I understand the importance of adhering to court deadlines and deeply regret this error. I respectfully request the court's consideration in reinstating my claim, given these extenuating circumstances.

**Regarding the debtor's objection**, which is based on my sale of the items related to my claim, I wish to clarify that this action was taken to mitigate damages, a principle supported by Oregon law under the Uniform Commercial Code (UCC).

Specifically, under Oregon Revised Statutes (ORS) Chapter 72 (UCC Article 2), a seller or buyer has a duty to mitigate damages in a breach of contract situation. By selling the items, I took reasonable steps to minimize the financial loss, which ultimately benefits both myself and the debtor's estate. Had I not sold the items, they may have depreciated further, resulting in a greater loss.

Moreover, several months prior, I furnished the debtor with comprehensive documentation detailing the sale of the property, which unequivocally demonstrates my diligent and good-faith effort to mitigate the losses stemming from the defective goods they supplied. This evidence not only substantiates my actions but also reinforces the legitimacy of my claim.

Furthermore, during a prior proceeding, Judge Hercher engaged in an extensive discussion with the debtor's attorney (Ms. Schoen), lasting nearly an hour, regarding this very sale. From my observation, Judge Hercher indicated that this sale was not problematic and that I acted within my rights to mitigate damages. For the Court's convenience, I have attached the sales receipt to this motion.

I believe my actions were consistent with sound business practices and legal principles. I acted in good faith to minimize losses and preserve value.

I am prepared to provide any additional documentation or information the court may require. I respectfully request a hearing to present my case and address the debtor's objection.

I am also aware of the court date scheduled for April 11, 2025 and will be present.

Thank you for your time and consideration.

Sincerely,

Matt Larson

5028 Zenith Ave South

Mpls, MN 55410

**Certificate of Service:**

I hereby certify that a true and correct copy of this Motion to Reinstate Claim and Objection to Amended Objection has been served upon all parties of record via electronic mail, in compliance with the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the District of Oregon.

Matthew Larson

## BILL OF SALE ADDENDUM

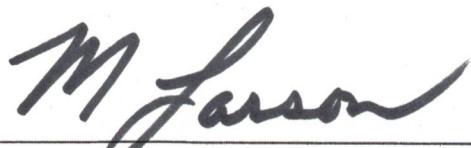
(The below underlined is additional information, not properly conveyed in the original bill of sale.)

This Bill of Sale is made on this 14th day of June 2024 between Matt Larson (Seller") and Mike Angell ("Buyer").

Seller, in exchange for consideration of 20,800 the receipt of which funds is acknowledged, hereby do grant, sell, transfer and deliver to Buyer the following goods: Vans RV14 kit #140986 consisting of the empennage, Fuselage and the wings. **AND**  
**NUMEROUS AIRCRAFT TOOLS (ATTACHED PAGE TWO AND**  
**THREE), PNEUMATIC INDUSTRIAL SQUEEZER, DRDT-2,**  
**MAIN SQUEEZE MODEL 22 AND 2 WING CRADLES.**

Buyer shall have full rights and title to the goods described above.

Seller is the lawful owner of the goods and the goods are free from all encumbrances. Seller has good right to sell the goods and will warrant and defend the right against the lawful claims and demands of all persons



Signature of Seller - Matt Larson



Signature of Buyer - Mike Angell

LARSON RV-14QB			
RV TOOL KIT CONSISTING OF THE FOLLOWING			
ITEM	QTY	NOMENCLATURE	NOTES
AT01	✓ 1	AIR TOOL OIL, 4 OZ	
AT02	✓ 1	AIR HOSE SWIVEL	
AT04	✓ 1	SPRING, QUICK CHANGE	
AT17	✓ 1	3X RIVET GUN WITH FLOW VALVE	
NPN	✓ 2	QUICK CHANGE PINS	INDUSTRIAL
AT87	✓ 1	ORANGE AIR DRILL	OPTION
AT22	✓ 1	RIVET SQUEEZER WITH 3" C-YOKE, 1" BASE	INDUSTRIAL
AT78	✓ 1	ADJUSTABLE SET HOLDER 1" BASE	INDUSTRIAL
BB10	✓ 1	BUCKING BAR, TUNGSTEN 4X1X5/8	
CL01	✓ 1	CLECO PLIERS	
CL02	✓ 165	3/32 CLECO'S, SILVER	QUICKBUILD
CL03	✓ 90	1/8 CLECO'S, COPPER	QUICKBUILD
CL06	✓ 4	1/2" JAW CLAMP CLECO	
CL07	✓ 4	1" JAW CLAMP CLECO	
CS02	✓ 1	3/32 #40 COUNTERSINK BIT	
CS03	✓ 1	1/8 #30 or #6S COUNTERSINK BIT	
CS05	✓ 1	3/16 or #10S COUNTERSINK BIT	
CS06	✓ 1	#21 or #8S COUNTERSINK BIT	
CS12	✓ 1	#12 COUNTERSINK	
CS19	✓ 1	#19 COUNTERSINK	
CS27	✓ 1	#27 COUNTERSINK	
CS30-120	✓ 1	120 DEG #30 COUNTERSINK	
CS08	✓ 2	COUNTERSINK CAGE	ADDED 1
DB02/DB30	✓ 6	#30 DRILL BIT	
DB03/DB12	✓ 1	#12 DRILL BIT	
DB04/DB19	✓ 1	#19 DRILL BIT	
DB05/DB40	✓ 8	#40 DRILL BIT	
DB06/DB30-12	✓ 1	12" #30 DRILL BIT	
DB07/DB40-12	✓ 1	12" #40 DRILL BIT	
DB09/DB21	✓ 1	#21 DRILL BIT	
DB10/DB27	✓ 1	#27 DRILL BIT	
DB11/DB1/4	✓ 1	1/4" DRILL BIT	
DB47/DB36	✓ 1	#36 DRILL BIT	
RV12-11/32/DB	✓ 1	11/32 DRILL BIT	✓
RV12-5/16/DB5	✓ 1	5/16 DRILL BIT	✓
RV12-DB#3/DB	✓ 1	#3 DRILL BIT	✓
RV12-DB11	✓ 1	#11 DRILL BIT	✓
RV12-DB16	✓ 1	#16 DRILL BIT	✓
RV12-DB52	✓ 1	#52 DRILL BIT	✓
RV14-#17/DB17	✓ 1	#17 DRILL BIT	
RV14-#33/DB33	✓ 1	#33 DRILL BIT	
RV14-#10/DB10	✓ 1	#10 DRILL BIT	
RV14-17/64/DB	✓ 1	17/64 DRILL BIT	
DS06	✓ 1	DRILL STOP SET OF 4	
DT01	✓ 1	PENCIL DEBURRING TOOL	
DT04	✓ 1	3M CUT & POLISH WHEEL 6"	
DT08	✓ 1	REDUCER BUSHING	
NPN	✓ 1	MINI WHEEL MANDREL	

NPN	✓ 2	1" 3M WHEEL	
GA01	✓ 1	RIVET HEAD GAUGE, 4-PC	
GA02	✓ 1	RIVET LENGTH GAUGE	
GA03	✓ 1	12" MACHINIST RULE	
HT08	✓ 3	PARTS MARKER	
HT53	✓ 1	PRO POP RIVET SWIVEL TOOL	
KT05	✓ 1	OFFSET LEFT SNIPS, RED	
KT06	✓ 1	OFFSET RIGHT SNIPS, GREEN	
KT07	✓ 1	OFFSET STRAIGHT SNIPS, YELLOW	
KT09	✓ 1	UNIBIT	
KT37	✓ 1	3/32 PIN PUNCH	
KT38	✓ 1	1/8 PIN PUNCH	
KT71	✓ 1	EDGE ROLLING HAND SEAMER	
RS01	✓ 1	AN470-3/32 RIVET SET	
RS02	✓ 1	AN470-1/8 RIVET SET	
RS04	✓ 1	AN470-3/16 RIVET SET	
RS22	✓ 1	SWIVEL FLUSH POLY GUARD RIVET SET	OPTION
RS06	✓ 1	AN470 1/8 DOUBLE OFFSET RIVET SET	
RS07	✓ 1	BACKRIVET SET	
RT01	✓ 12	RIVET TAPE DOTS FOR FLUSH SET	
SM30	✓ 1	SPEED DEBURRING TOOL	
SM33	1	COMMERCIAL DIMPLER	SHIPS SEPARATELY
SM39	✓ 1	FLUTING PLIERS	
SS01	✓ 2	FLUSH SET, 1/8" THICK	
SS02	✓ 1	FLUSH SET, 1/4" THICK	
SS03	✓ 1	FLUSH SET, 3/8" THICK	
SS05	✓ 1	AN470-3/32	
SS06	✓ 1	AN470-1/8 RIVET SET	
SS08	✓ 1	AN470-3/16 RIVET SET	
SS09S	✓ 1	3/32 SMALL DIA DIMPLE DIE - FEMALE	
SS12	✓ 1	AN426-3/16/#10 SCREW DIMPLE DIES	
SS13	✓ 1	AN426 #6 SCREW DIMPLE DIES	
SS14	✓ 1	AN426 #8 SCREW DIMPLE DIES	
SS20	✓ 1	AN426-3/32 SPRINGBACK DIMPLE DIES	
SS21	✓ 1	AN426-1/8 SPRINGBACK DIMPLE DIES	
SS15	✓ 1	DIMPLE DIE ORGANIZER	
SS19	✓ 12	WASHER, SQUEEZER SET	
NPN	✓ 1	TECHNICAL MANUAL	